

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

K.D.,

Plaintiff

V.

HARVARD PILGRIM HEALTH CARE,  
INC., HARVARD PILGRIM – LAHEY  
HEALTH SELECT HMO, AND LAHEY  
CLINIC FOUNDATION, INC.,

Defendants

CIVIL ACTION NO. 20-11964

**PLAINTIFF’S MOTION FOR LEAVE TO PROCEED UNDER A PSEUDONYM  
AND TO IMPOUND**

This Motion is submitted in support of the Plaintiff, K.D.’s request: (1) for an order granting leave to proceed with her Complaint under a pseudonym; and (2) for an order directing the Clerk to seal and impound the Plaintiff’s Memorandum in Support for her Motion for Leave to Proceed Under a Pseudonym and to Impound, the Plaintiff’s affidavit and Plaintiff’s doctor’s affidavit submitted in support of this Motion, and all subsequent documents containing any medical and/or identifying information associated with this proceeding. In support of her Motion, the Plaintiff states that this suit, in which Plaintiff seeks recovery of health insurance benefits owed to her under her mother’s employer-sponsored health insurance plan, concerns the Plaintiff’s mental health condition while she was a minor and when she eighteen years old. These issues reach into the utmost private areas of the Plaintiff’s life and are at the cornerstone of the dispute in this case. Public disclosure of the Plaintiff’s name and the pleadings and proceedings in this action would have a severe, damaging impact on the Plaintiff and her ongoing recovery,

and will negatively impact the Plaintiff's ability to establish herself as an autonomous adult, complete her studies, and pursue a career. As set forth in the accompanying Memorandum, numerous other courts have permitted plaintiffs to use a pseudonym and to seal the proceedings under comparable circumstances.

An affidavit executed by the Plaintiff providing her true name and the facts of this matter has been filed herewith. *See* Exhibit A to the Plaintiff's Memorandum in Support of Plaintiff's Motion for Leave to Proceed Under a Pseudonym and to Impound. No prejudice to the Defendants can arise from proceeding under a pseudonym.

WHEREFORE, the Plaintiff respectfully requests that this Motion be granted.

Date: October 30, 2020

Respectfully submitted,

K.D.

By her attorneys,

/s/ Sarah E. Burns

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